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March 27, 2020

Via Electronic Filing

Honorable Karen M. Williams, U.S.M.J.
United States District Court – District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets – Courtroom 5C
Camden, NJ 08101

Re: Kristine Keyes v. Nationstar Mortgage, LLC, et al.
Civil Action No. 1:20-cv-02649

Dear Judge Williams:

This firm represents defendants U.S. Bank Trust, N.A. as Trustee for LSF9 Master Participation Trust (“U.S. Bank”) and Mortgage Electronic Registration Systems, Inc. (“MERS”) in the above-referenced matter. I submit this letter on behalf all parties who have entered an appearance in this action to jointly request an adjournment of the Fed. R. Civ. P. 16 scheduling conference, which is presently scheduled for April 16, 2020.¹

As Your Honor is aware, this matter was removed to this Court from the Superior Court of New Jersey, Law Division, Camden County, on March 11. (*See* ECF No. 1). Your Honor has set the initial scheduling conference for April 16. (*See* ECF No. 2). The parties request an adjournment in light of the current COVID-19 crisis, which has had an impact on the filing deadlines for each of the parties. To date, U.S. Bank and MERS have filed a motion to dismiss Plaintiff’s Complaint (ECF No. 9), and the expectation is that plaintiff and the other defendants will be filing motions as well. Therefore, the parties respectfully request that Your Honor adjourn the initial conference until after the parties have filed their respective responsive pleadings.

¹ The respective counsel for plaintiff Kristin Keyes, defendant Nationstar Mortgage, LLC, and defendant RAS Citron Law Offices consent to this request. Defendants Bank of America, N.A. and Sheriff of Camden County have not yet entered an appearance, and their counsel is not yet known. Therefore, we were unable to consult these parties for consent.



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Thank you for your attention and consideration in this matter. Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Joy Harmon Sperling

Joy Harmon Sperling

Encl.

cc: Joshua Thomas, Esq. (via email)
David Neeran, Esq. (via e-mail)
Francesca Arcure, Esq. (via e-mail)